

# **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MEGHAN ABBOTT,

Plaintiff,

v.

WELSPUN INDIA LTD., and WELSPUN USA  
INC.,

Defendants.

**Case No. 1:16-cv-06792-RJS-DCF**

**ECF Case**

**CLASS ACTION**

**DECLARATION OF ROBERT B. CAREY IN SUPPORT OF THE JOINT  
APPLICATION OF HAGENS BERMAN AND STECKLER GRESHAM COCHRAN  
PLLC TO BE APPOINTED INTERIM CO-LEAD COUNSEL**

I, ROBERT B. CAREY, declare as follows:

1. I am a member of the law firm of Hagens Berman Sobol Shapiro LLP, one of the counsel of record for Plaintiffs in *Meghan Abbott v. Welspun India, Ltd., et al.*, No. 1:16-cv-06792-RJS-DCF. I am admitted *Pro Hac Vice* in this Court in the above-entitled matter. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following documents:

Exhibit A: Hagens Berman Sobol Shapiro LLP firm resume;

Exhibit B: The Paynter Law Firm resume;

Exhibit C: McCuneWright LLP firm resume;

3. Counsel for the Abbott plaintiffs agreed to support the leadership team set forth in the Joint Application for Appointment of Hagens Berman and Steckler Gresham Cochran as co-lead counsel.

4. Proposed Interim Co-Lead Counsel agreed to work in good faith to distribute work equitably to counsel for the Abbott Plaintiffs to benefit the class.

5. Proposed Interim Co-Lead Counsel agreed to share fees based on work actually performed to benefit the putative class.

6. Proposed Interim Co-Lead Counsel and the PEC agreed to split costs equally.

7. Along with Mr. Steckler and Mr. Paynter, I offered these same terms to counsel for Plaintiff Brower, but they refused to accept these terms and insisted on a guaranteed 25% of any recovery, notwithstanding the amount and quality of their work and without regard to their experience and skill vis-à-vis the other attorneys for the putative class.

8. I have personally worked with the Paynter Law Firm and McCune Wright LLP in the past and am familiar with each respective firm's attorneys, work product, and successes, and my firm has worked on a case with Mr. Steckler's firm, though we have never met.

9. My firm has initiated service on Welspun India using the procedures set forth by the Hague Convention on the Service Abroad of Judicial & Extrajudicial Documents in Civil or Commercial Matters. The process is expensive and time consuming, and according to our vendor should take at least six more months to perfect service.

10. Hagens Berman has researched the corporate structure and activities of Welspun and its subsidiaries, and investigated the scope and nature of retailers' investigation into the use of Egyptian cotton in products manufactured by Welspun.

11. We have also developed sources in the media knowledgeable about Welspun's history and issues related to the allegations in the complaint, conducted interviews and collected documents regarding the cotton industry, researched global supply chains related to Egyptian cotton, and researched advertising and marketing sources regarding Welspun.

12. When conducting our investigation, we have been assisted by investigators who have the ability to collect documents and conduct interviews in India.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 9th day of December 2016, at Phoenix, Arizona.

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*s/ Robert B. Carey*  
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ROBERT B. CAREY

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

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*s/ Robert B. Carey*  
ROBERT B. CAREY